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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

J.P., by and through his Guardian  
Ad Litem, SHANNON VILLANUEVA

Plaintiff,  
v.

COUNTY OF ALAMEDA, DIANE DAVIS  
MAAS, SUE MAY, TRIAD FAMILY  
SERVICES, MARIA REFUGIO MOORE,  
and DOES 1-30, inclusive.

Defendants.

Case No: 4:17-cv-05679-YGR

**THIRD STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINES FOR  
PLAINTIFF J.P. AND DEFENDANT TRIAD  
FAMILY SERVICES RELATING TO  
TRIAD'S FIRST SUMMARY-JUDGMENT  
MOTION**

Date: June 18, 2019  
Time: 2:00 p.m.  
Courtroom: 1, 4<sup>th</sup> Floor, 1301 Clay Street,  
Oakland, CA  
Judge: The Hon. Yvonne Gonzalez Rogers

Complaint Filed: October 2, 2017  
Trial Date: TBD

1 Defendant TRIAD FAMILY SERVICES (“TRIAD”) and plaintiff J.P., by and through their  
2 respective counsel, hereby stipulate as follows:

3 Whereas, (following the first stipulation) TRIAD filed a motion for summary judgment on  
4 April 12, 2019 (Dkt.117) and this Court set a deadline for plaintiff J.P. to oppose this motion  
5 (following the second stipulation) on May 17, 2019 and TRIAD to reply on May 24, 2019 with a  
6 hearing set on June 18, 2019;

7 Whereas the parties continue to meet and confer as reflected in the joint letter filed on  
8 May 13, 2019 (Dkt. 120) and ruled on May 14, 2019 (Dkt. 121) relating to the County  
9 Defendants’ designation of deposition testimony as confidential;

10 Whereas plaintiff will file his administrative motion to seal on May 15, 2019;

11 Whereas it would save judicial resources for the plaintiff to first file an administrative  
12 motion to determine whether any designated deposition testimony must be filed under seal before  
13 submitting a request to also file his brief and statement of facts under seal;

14 Whereas the Court permitted the parties to confer and propose a stipulation to extend  
15 deadlines to allow for a motion to seal to be adjudicated.

16 IT IS STIPULATED, pursuant to Rules 7-12 of the Civil Local Rules of the United States  
17 District Court for the Northern District of California that:

- 18 1. The plaintiff’s deadline to respond to Triad Family Services’ summary-judgment  
19 motion be extended from May 17, 2019 to May 31, 2019;
  - 20 2. Triad’s reply be extended from May 24, 2019 to June 7, 2019; and,
  - 21 3. The parties request that the Court retain the current hearing date of June 18, 2019.
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Dated: May 15, 2019

**MATHENY SEARS LINKERT & JAIME LLP**

By: /s/Ronald E. Enabnit

Ronald E. Enabnit  
Attorneys for Defendant TRIAD FAMILY  
SERVICES

Dated: May 15, 2019

**SCOTT LAW FIRM**

By: /s/ Lizabeth N. de Vries

Lizabeth N. de Vries  
Attorneys for Plaintiff J.P.

**ELECTRONIC CASE FILING ATTESTATION**

I, Lizabeth N. de Vries, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that concurrence in the filing of these documents has been obtained from each of its signatories.

Dated: May 15, 2019

**SCOTT LAW FIRM**

By: /s/ Lizabeth N. de Vries

Lizabeth N. de Vries

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, THE FOLLOWING IS ORDERED.

1. The plaintiff's deadline to file a response to Triad Family Services' summary-judgment motion is extended from May 17, 2019 to May 31, 2019;
  2. Triad's deadline to file a reply is extended from May 24, 2019 to June 7, 2019;
- and,
3. The Court shall retain the current hearing date of June 18, 2019.

DATED: May \_\_\_, 2019

YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE

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